

September 29, 2020

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TO: Office of Chief Judge S. Maurice Hicks, Jr.

TONY R. MOORE CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT LOUISIANA  
BY *[Signature]*

CC: Shannon Thornhill Brown, U.S. Attorneys Office (SHV)

Answer to the Complaint: Case 5:20-cv-01087-SMH-MLH  
USA vs. Wendi LaBorde, Defendant  
Summons Into Civil Action

This is a lawsuit I received (In my current residential mailbox, on 09/17/2020) from the DOJ, regarding my student loan debt. I took out a total amount of approximately \$75,000 in government educational loans during the early 1990s, while pursuing a Ph.D. in Clinical Psychology. The DOJ is claiming that I owe them \$440,482.11, secondary to fees/interest on these original HEAL/STAFFORD loans. Shannon Brown flew to California in 2017 to put me through a Debtor Examination (I had already undergone others, beginning in 2010). In 2017, I began sending monthly payments to her of \$200 (Temporarily suspended by President Trump, in 04/2020, secondary to the CARES Act, associated with the current COVID-19 Pandemic). To my knowledge, she has cashed all of the payment checks over the past 3 years. The DOJ refused to give me a settlement offer/formal payment plan in writing, after the Debtor Examination. They have refused to do so at any time, since year 2010.

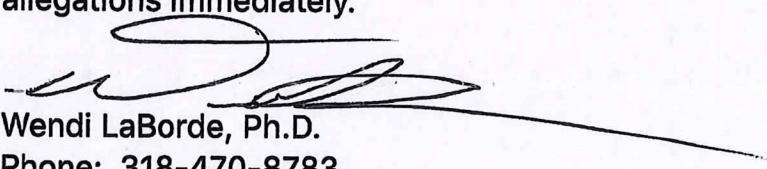
PLEASE LET IT GO ON RECORD MY RESPONSE AS FOLLOWS TO THE SUIT:

1. I did not receive the suit until 09/17/2020, and still have not been formally served. The letter has a green Certified Mail sticker on it and a sticker with my current address. The suit was not originally sent to my present address. It appears to have been forwarded. No one formally served me. The document was just sitting in my mailbox. The document is dated 08/24/2020 and says I have 21 days to respond. I received the document subsequent to that 21 day timeline. I have been desperately trying to locate an attorney to represent me, but thus far, been unsuccessful. They are asking for very large retainers;

stating they do not practice this sort of law; etc. etc. etc. Please allow me more time to gather my formal legal defense. I work primarily with disabled Veterans, and referrals have been significantly impacted by COVID-19 regulations.

2. I DENY THE ALLEGATIONS IN THE SUIT. The statements made against me are NOT true. My mother died in 2014. Her Will asks that a Trust be made for her only granddaughter, aka, my only child, Connie ("CeCe") LaBorde. I inherited life insurance proceeds from my mother and formed the Trust, with CeCe as the Beneficiary. The Toyota and condominium located at 850 Beech St. #315, San Diego, CA, claimed by Ms. Brown to be currently owned by the Trust, are not. The Trust sold both the car and the condo long ago. I have been driving a leased vehicle (2018 Lexus ES 350) for over 2 years. I will save my defense, regarding the numerous other false statements made against me and against the Trust, by Ms. Brown, for a later time, when I have found an Attorney to help me defend myself from this false, vicious attack.
3. I am in the process of obtaining representation to hopefully move the suit to the state of California. This is the state where I have been residing since 2015; and, is the state where items owned by my daughter's Trust have been located. I believe the form to be completed ASAP is Forum Convenience.

Thank you for your time. I apologize for the direct communication; but feared the judgment would be entered if I did not provide some sort of written denial of the allegations immediately.



Wendi LaBorde, Ph.D.  
Phone: 318-470-8783  
Email: drwllaborde@gmail.com